



**U.S. Department of Justice**

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

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Martinsburg, WV 25405

[www.atf.gov](http://www.atf.gov)

AUG 28 2018

907010: RKD  
3311/307385

[REDACTED]  
Buda, Texas 78610

Dear Sir,

This is in reference to your submission and accompanying correspondence to, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), accompanied by an AR-15 type rifle equipped with what is described as the [REDACTED] AR1 trigger system (see enclosed photos). Specifically, you requested an examination and classification of this sample with regard to the amended Gun Control Act of 1968 (GCA) and the National Firearms Act (NFA).

As you know, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term “machinegun” as—

*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

As specified in the GCA, 18 U.S.C. § 921(a)(23), the term “machinegun” has “the meaning given such term in section 5845(b) of the National Firearms Act (26 U.S.C. 5845(b)).

The submitted [REDACTED] AR1, is described as a “trigger-finger reset device”. You further describe the design and function of the device by explaining that “this trigger system works by mechanically pushing the trigger rapidly forward, resetting the finger and trigger to the forward

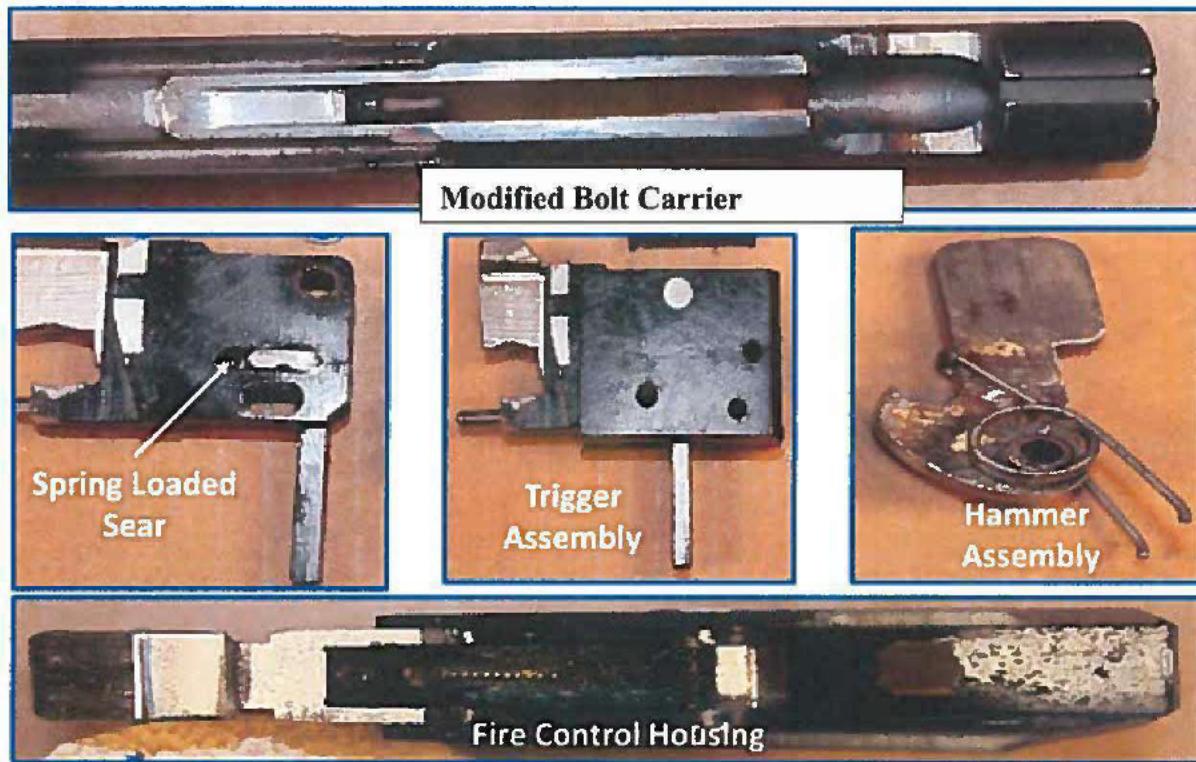
position. This allows the user to make a decision in which they leave rearward pressure off the trigger to stop the firing sequence, or re-engage rearward pressure on the trigger to continue the firing sequence." As a part of this description, you note that all of the components of the [REDACTED]

[REDACTED] AR1 trigger are newly designed and include a bolt, housing, trigger, hammer, sear, springs and pins. FTISB notes that US Patent 9568264 (Flex-fire technology) covers the device, which is described as a technology to provide the potential of increasing both the rate of fire and the precision of fire at higher rates beyond the fundamental design capabilities of pre-existing semi-automatic arms.

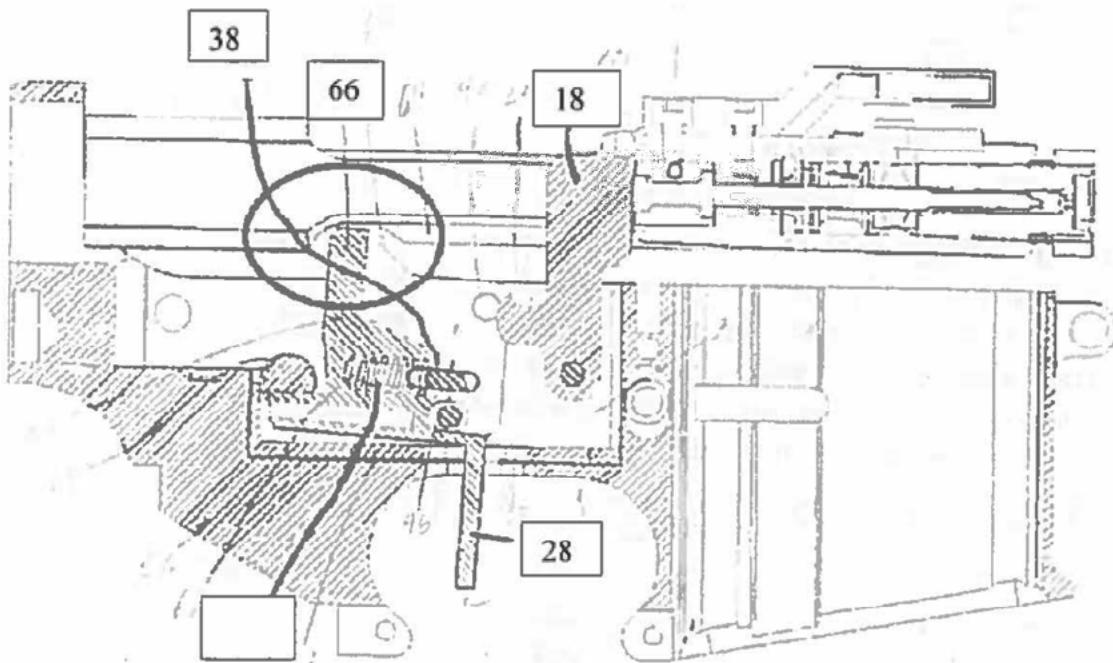
Also, your correspondence notes that ATF has previously interpreted the phrase "single function of the trigger" to mean a single movement of the trigger, whether that movement is the pull of the trigger or the release of the trigger and it is your opinion that this device submitted is only a trigger reset device and not a "machinegun" as defined.

The sample examined by FTISB personnel consists of a Colt Competition .223/5.56 caliber AR-15 pattern rifle, serial number CCR012176, which is equipped with the following items:

- Modified bolt carrier.
- Newly constructed hammer assembly.
- Newly constructed fire control housing.
- Newly constructed trigger assembly having steel block mounted on rear of assembly.
- Newly constructed spring loaded sear assembly.
- Miscellaneous retaining axles/screws, plungers/springs.



Provided illustration of [REDACTED] ARI Trigger Device.



This illustration depicts how the parts interact.

No. 66 is the extension of the trigger that rests in the bolt cam

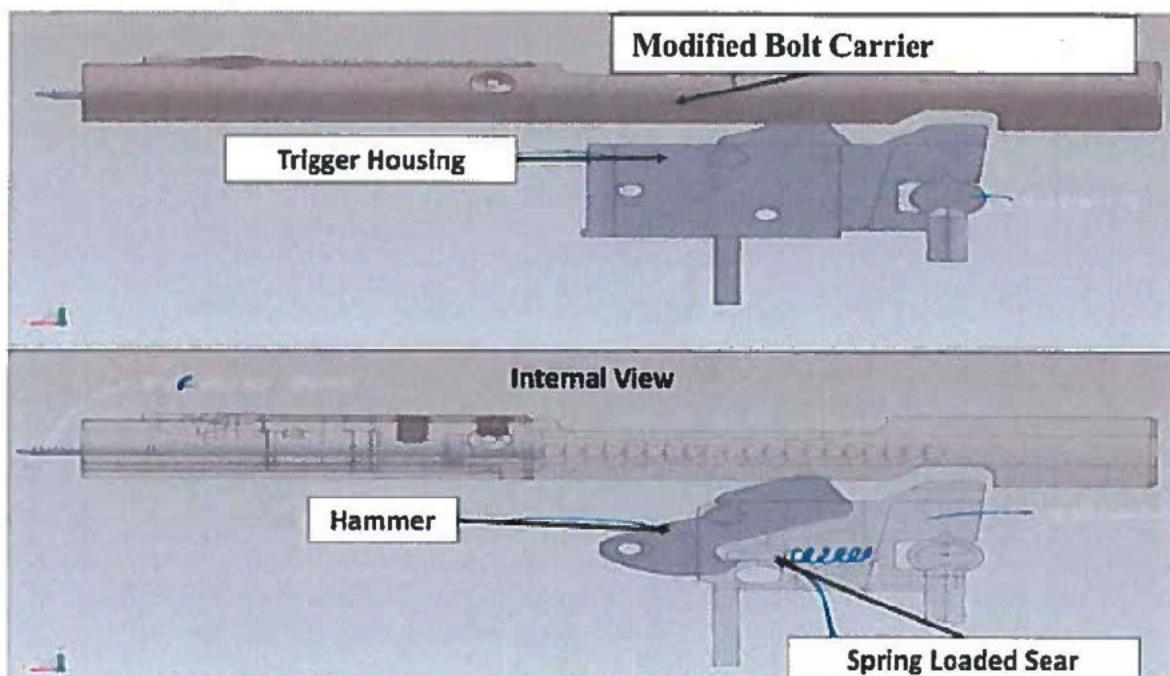
No. 28 is the portion of the trigger that interacts with the user's finger.

No. 38 is the spring loaded sear.

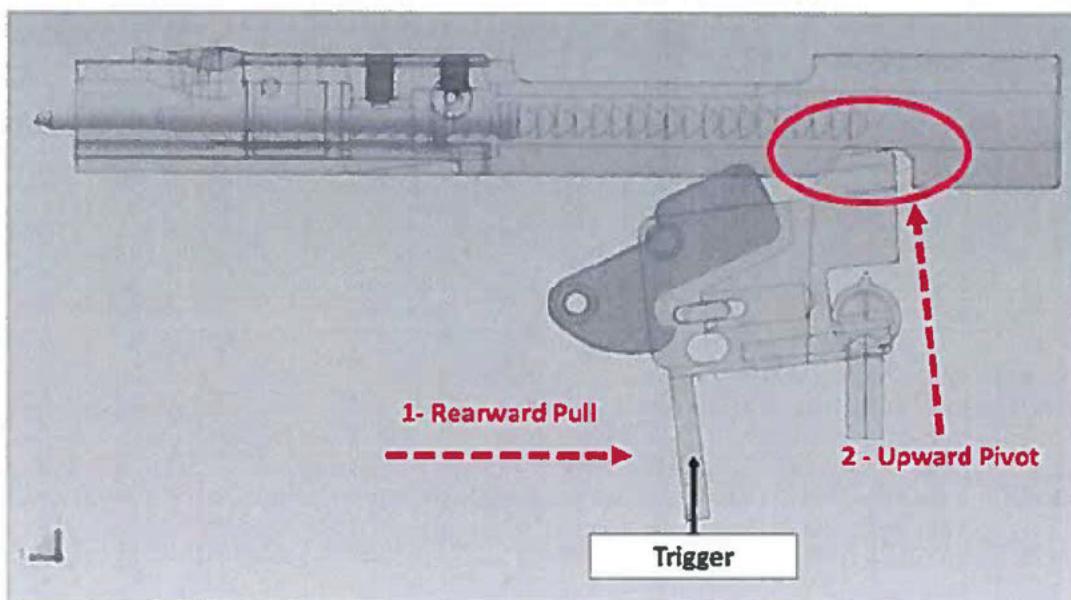
No. 18 is the hammer.

The written correspondence received from [REDACTED] LLC with the sample, provided the following statements and pictures offering a description of how the device differed in function from that of a standard unmodified AR-15 pattern rifle [Note: FTISB updated the pictures relevant to FTISB's analysis of the [REDACTED] AR1]:

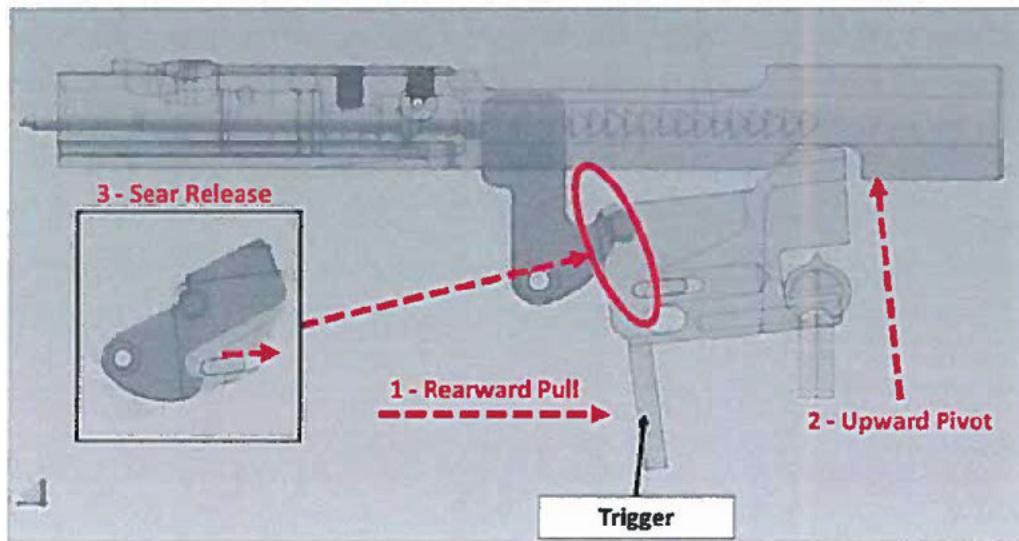
*"We start with the trigger in the forward position and the hammer in the cocked position, with the bolt in battery."*



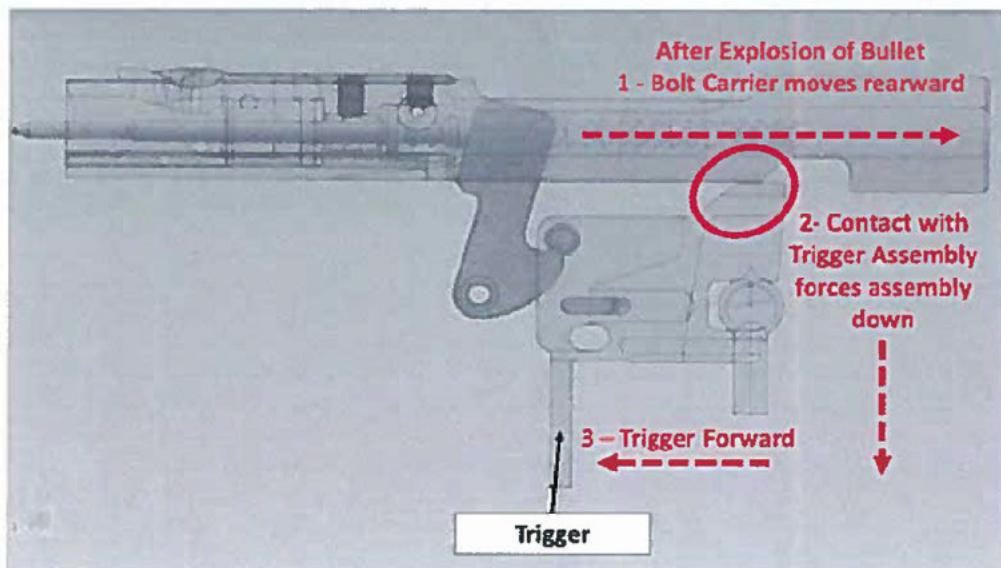
*"When the trigger is pulled rearward it also pivots upward into an open space in the bolt."*



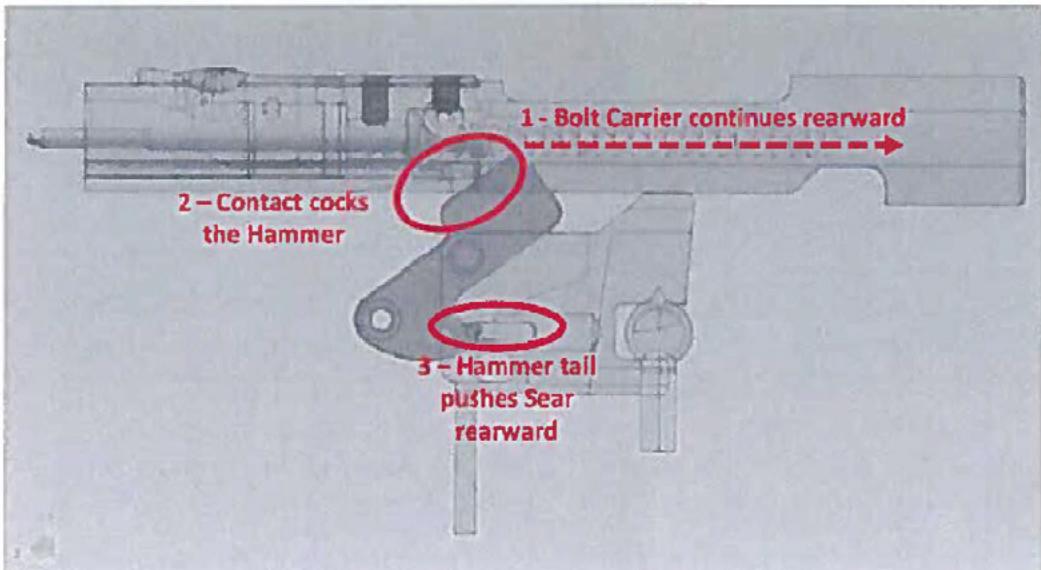
*"As the trigger pivots back and up into the open space in the bolt, the sliding sear surface in the trigger separates from the tail of the hammer and the hammer releases and fires a round."*



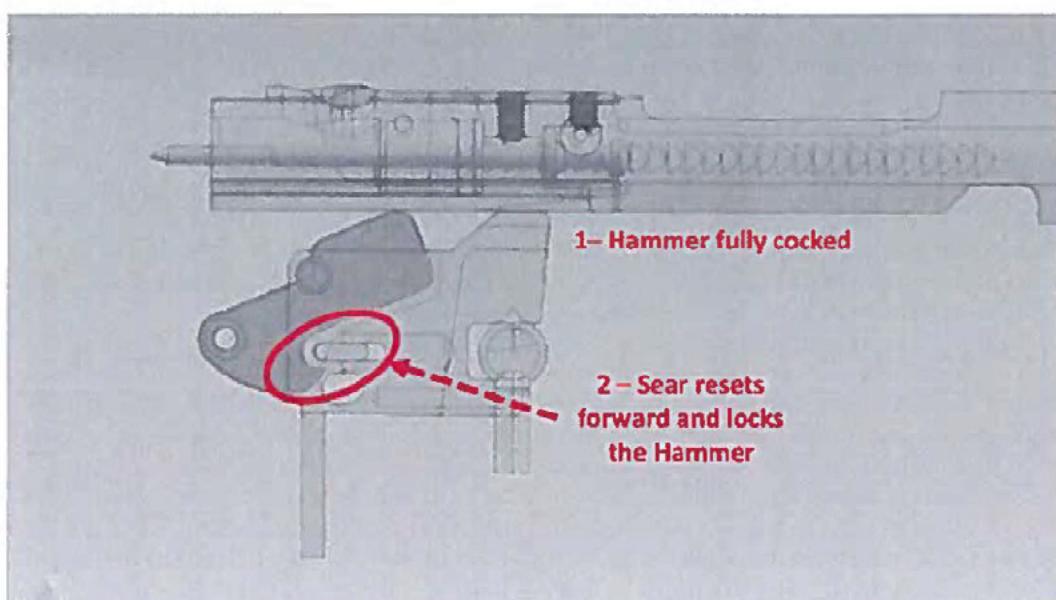
*"The explosion of the bullet causes the bolt to move in a rearward direction. As the bolt moves rearward it contacts the top of the trigger and forces the tip of the trigger down, pivoting the blade of the trigger to the forward (reset) position."*



*"At this point the trigger is in the forward (un-pulled) position. The bolt continues rearward cocking the hammer, which moves the integrated trigger sear rearward". [We note that the shooter maintains a constant rearward pull on the trigger and the internal mechanism automatically forces the individual's finger/trigger forward instead of requiring that the shooter release the trigger.]*



*"At the rear of the bolt's stroke the hammer is cocked and the trigger sear is forced forward into a reset position (by spring pressure), locking the hammer in the cocked position."*



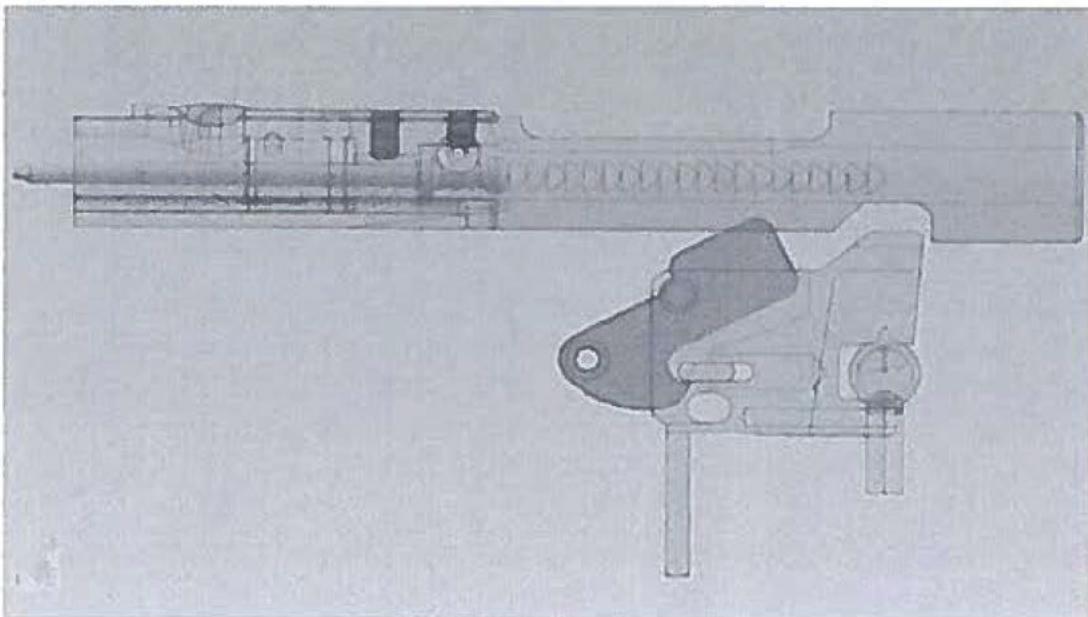
*"The bolt returns to battery and the hammer is now cocked against the trigger ready to fire the next round".*

As explained below, a single constant rearward pull will cause the firearm to fire until the trigger is released, the firearm malfunctions, or the firearm exhausts its ammunition supply.

[REDACTED]

[REDACTED]

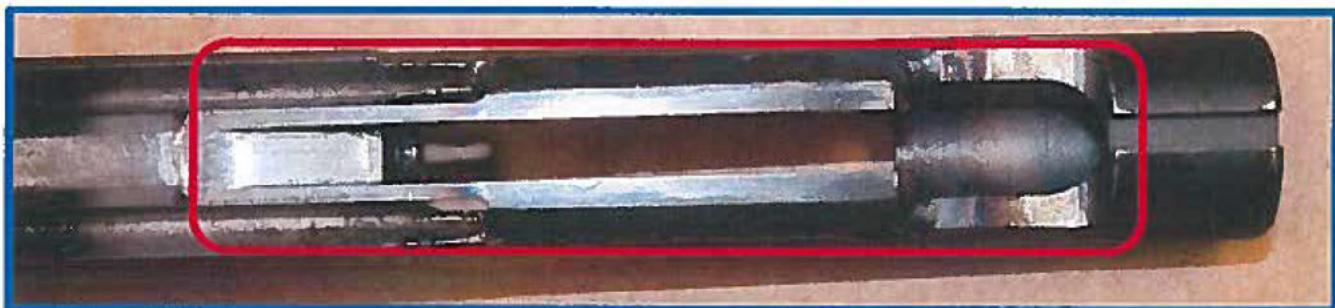
[REDACTED]



**Submitted Sample Rifle**



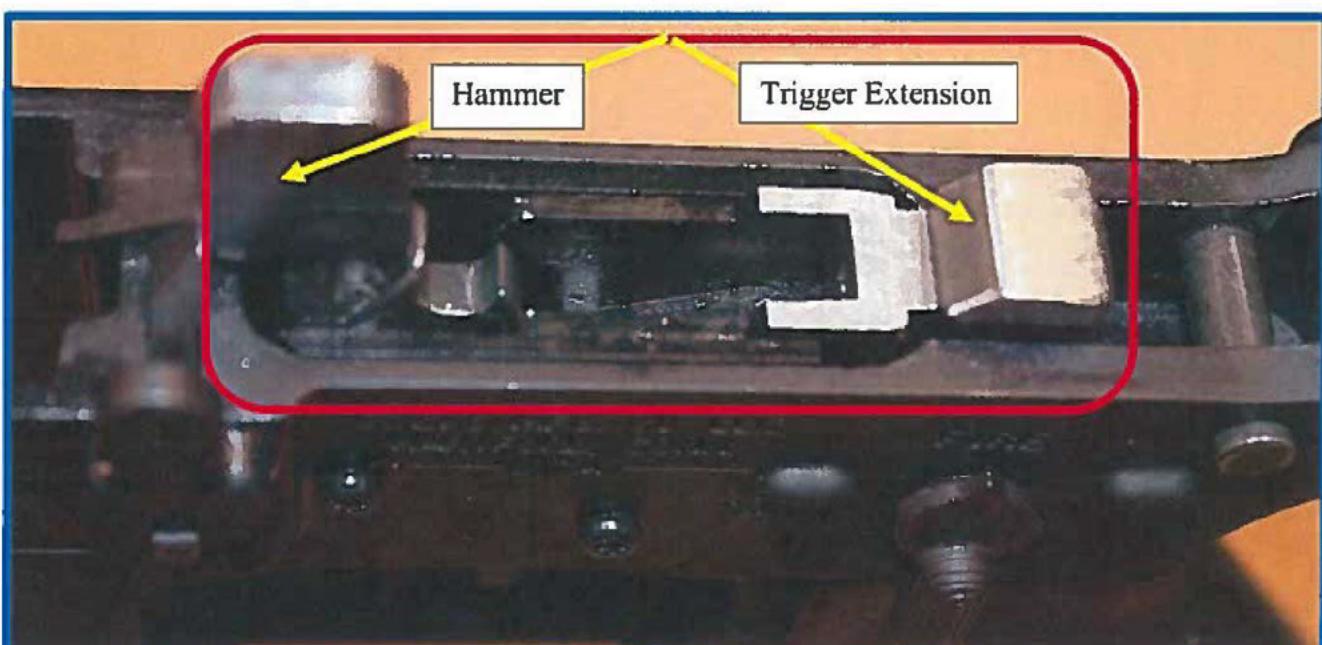
**Sample modified bolt carrier showing added contact surface that interfaces with trigger.**



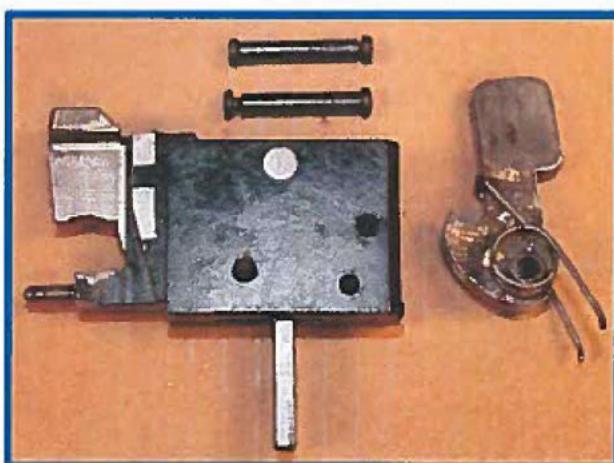
**FTCB exemplar standard bolt carrier.**



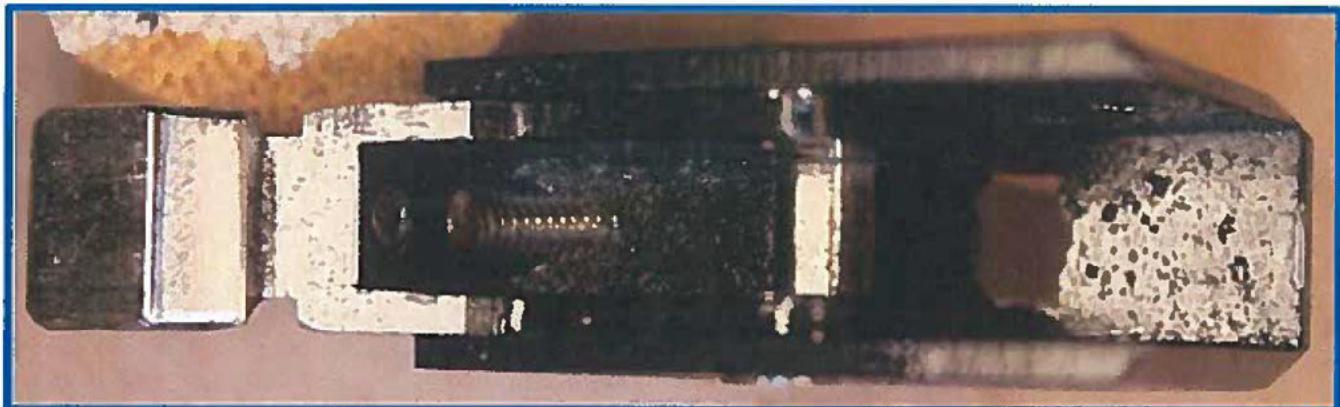
**Internal View - Sample fire control mechanism (installed).**



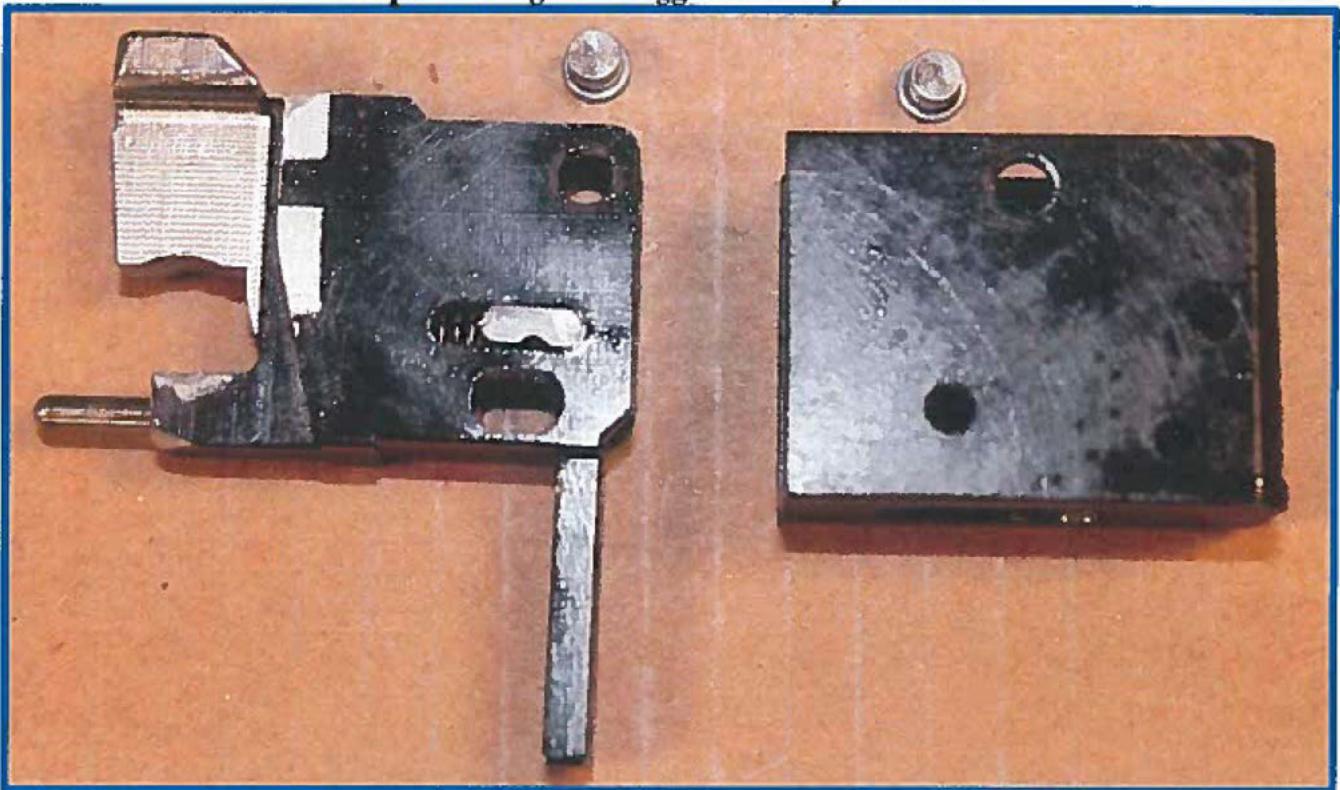
**Sample fire control mechanism with the bolt carrier removed from firearm.**



**Overhead view of fire control mechanism**



**Sample housing with trigger assembly removed.**



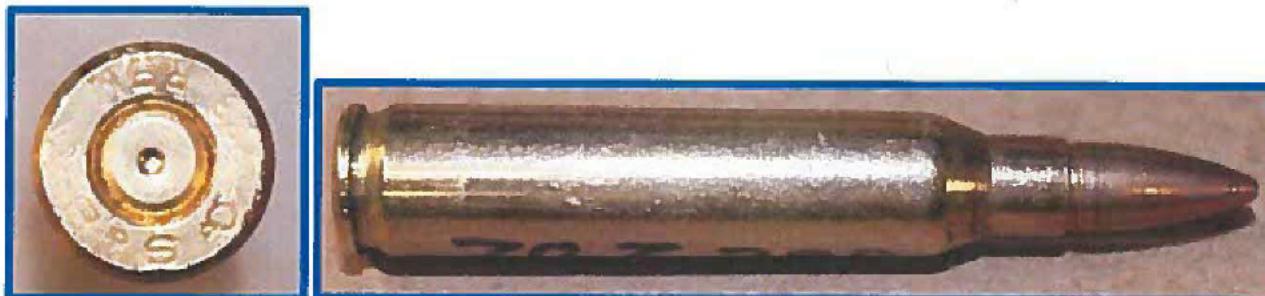
Sample [REDACTED] AR1 fire control mechanism installed in AR-15 type firearm.



As a part of this examination, FTISB conducted initial manual field-testing of the sample. The field test revealed that when the trigger was pulled with sufficient force to release the hammer, and the shooter maintains constant pressure on the trigger, the firearm expelled a projectile, extracted and ejected the casing, loaded another round, and fired. This continued until the trigger was released. A test fire with live ammunition resulted in the firearm shooting automatically more than one shot, without manual reloading, by a single function of the trigger.

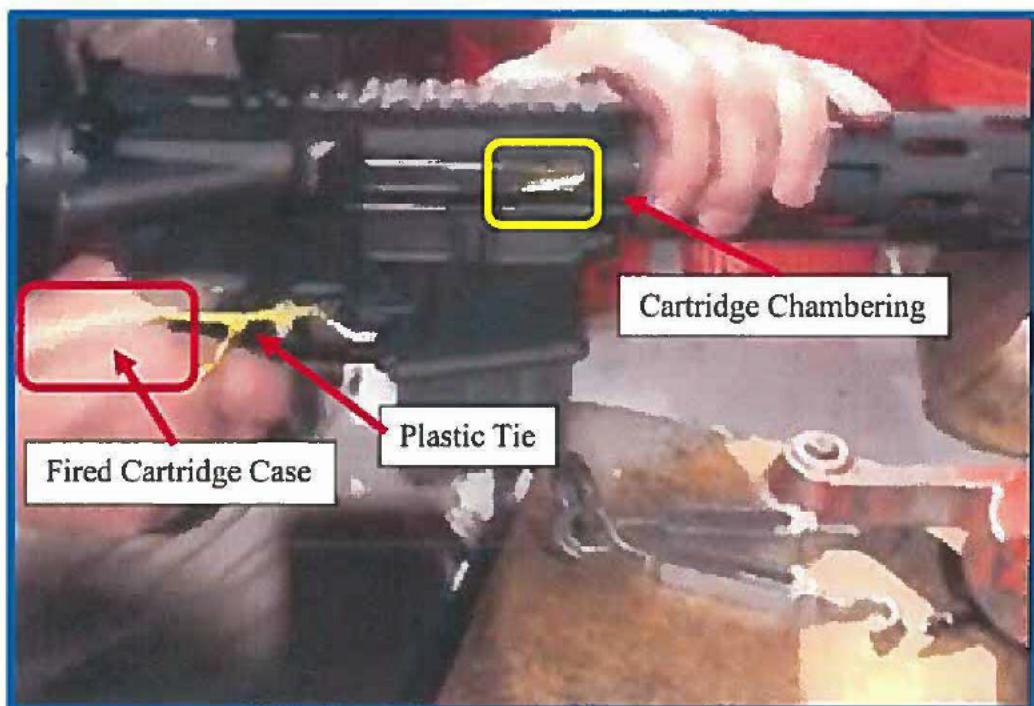
Additionally, during the finger activated firing sequences (with the trigger finger retained in a constant position), after firing several cartridges the sear failed to retain the hammer, which simply followed the bolt forward leaving a substantial firing pin mark on the primer of the chambered cartridge without firing the cartridge.

**Photo of FTISB test cartridge removed from sample after hammer follow incident.**



In order to demonstrate the sample fired more than one shot, without manual reloading, with a single function of the trigger, rather than firing a single shot with each function of the trigger, the following procedure was followed.

- A common 8-inch zip-tie was installed around the rear of the grip and the front of the sample's trigger.
- The zip-tie was gradually tightened until the trigger was retracted just enough to release the hammer.
- With the trigger retained in this position, the bolt assembly was retracted and retained in an open position, with the aid of the bolt catch.
- A ten-round ammunition load was placed into the sample's magazine, and the magazine was inserted into the firearm.
- Without touching the trigger (which was being retained in a fixed position by the plastic zip-tie), the bolt catch was depressed allowing the firearms bolt to travel forward and chamber a cartridge. Upon chambering and firing the first cartridge, the weapon cycled and fired five cartridges automatically without the trigger being released. The sear also failed to retain the hammer on the 6<sup>th</sup> cartridge, but did not strike the primer with sufficient force to fire that cartridge, thereby stopping the firing sequence.
- This same test was repeated several times with the sample firing from three to ten cartridges with a single function of the trigger before a malfunction was encountered or the ammunition load expended.



The previous still image extracted from a video of the FTISB test fire shows cartridge chambering in the yellow box and one of the ejected cartridges in the red box. Note that additional ejected cartridge cases are out of frame and trigger is retained with zip-tie and not in contact with finger.

Federal law defines “machinegun,” in relevant part, as “any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger” as well as a “combination of parts designed and intended, for use in converting a weapon into a machinegun.” Legislative history for the NFA indicates that the drafters equated a “single function of the trigger” with “single pull of the trigger.” National Firearms Act: Hearings Before the Comm. on Ways and Means, House of Representatives, Second Session on H.R. 9066, 73rd Cong., at 40 (1934). Therefore, as you note, ATF has long held that a single function of the trigger is a “single pull” or alternatively, a single release of a trigger. Therefore, a firearm is not a machinegun if a projectile is expelled when the trigger is pulled and a second projectile is expelled when the trigger is released.

As stated above, your own description of the [REDACTED] AR1 trigger system includes the following statements, “*this trigger system works by mechanically pushing the trigger rapidly forward, resetting the finger and trigger to the forward positon. This allows the user to make a decision in which they leave rearward pressure off the trigger to stop the firing sequence, or re-engage rearward pressure on the trigger to continue the firing sequence.*”

Federal courts have noted that automatically means that the weapon “fires repeatedly with a single pull of the trigger.” *Staples v. United States*, 511 U.S. 600, 602 n. 1 (1994). “That is, once its trigger is depressed, the weapon will automatically continue to fire until its trigger is released or the ammunition is exhausted.” *Id.* Courts have specifically affirmed ATF’s interpretation that a single act of the shooter to initiate the firing sequent is a single function of the trigger. *Akins v. United States*, 312 F. App’x 197, 200 (11th Cir. 2009); *Freedom Ordnance Mfg., Inc. v. Brandon*, No. 3:16-cv-00243-RLY-MPB (S.D. Ind. Mar. 27, 2018). *United States v. Fleischli*, 305 F.3d 643, 655 (7<sup>th</sup> Cir. 2002)(in which electronic switch was the trigger when it served to initiate the firing sequence and the minigun continued to fire until the switch was turned off or the ammunition was exhausted). In the *Freedom Ordnance* case, the United States District Court of Indiana confirmed that ATF was not arbitrary and capricious in the classification of an “electronic reset assist device” as a machinegun even though the firearm’s trigger reset before each shot by pushing the shooter’s finger forward. *Freedom Ordnance Mfg., Inc.*, No. 3:16-cv-00243-RLY-MPB. In these cases, a firearm is a machinegun when an internal mechanism or operation automatically forces the individual’s finger forward instead of requiring that the shooter release the trigger.

FTISB testing indicated that continuous rearward pressure after the initial pull of the trigger initiates a “firing sequence” which discharges multiple rounds with a single function of the trigger. A device with a trigger that is mechanically forced forward during a cycle of operation or firing sequence, which results in more than one round being fired with a “single function of a trigger,” is a machinegun. This type of operation is distinguishable from firearms that have not been classified as machineguns, including those that fire one round when the trigger is manually pulled and one round when the trigger is manually released.

The [REDACTED] AR1 is a device which is designed to assist in preventing the hammer from positively resetting (requiring that the shooter release the trigger in order to fire the next round) and causes a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger. This device is a, combination of parts designed and intended, solely and exclusively, for use in converting a weapon into a machinegun; thus a "machinegun" as defined in 26 U.S.C. § 5845(b).

Additionally, note that on several occasions during the testing of this device, the hammer was found to have followed the bolt into battery as it chambered a cartridge. FTISB has also evaluated similar devices, which have prevented the trigger from positively resetting and resulted in such a "hammer-follow" scenario. A device designed to prevent the hammer from positively resetting could cause a firearm to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, and would also be classified as a combination of parts designed and intended, solely and exclusively, for use in converting a weapon into a machinegun; thus a "machinegun" as defined in 26 U.S.C. 5845(b).

Consequently, the submitted sample [REDACTED] AR1 trigger assembly equipped firearm is a "machinegun" as defined in the NFA, and is subject to all NFA provisions. In addition, the sample [REDACTED] AR1 trigger assembly parts are a combination of parts designed and intended, for use in converting a weapon into a machinegun, and as such, in and of themselves, would be defined as a "machinegun" and subject to all NFA provisions.

The GCA prohibits the possession or transfer of any machinegun manufactured after May 19, 1986 with the limited exceptions of transfers to or by the government, and possession under the authority of the government. *See* 18 U.S.C. § 922(o). Based on these exceptions, Type 07 (manufacturer) and Type 08 (importer) Federal firearms licensees to manufacture or import firearms after May 19, 1986 for sale or distribution to the government. Because you are a 07/02 FFL/SOT, ATF will return the [REDACTED] AR1 trigger device equipped firearm upon receipt of a prepaid common carrier shipping label or FedEx shipping account billing number. Please be advised that the firearm/device will need to be properly marked, and an ATF Form 2 submitted by the close of the following business day that you receive the sample.

We thank you for your inquiry and trust that the foregoing has been responsive.

Sincerely yours,



Michael R. Curtis

Chief, Firearms Technology Industry Services Branch

cc: Rick Vasquez Firearms LLC

Shipped from [REDACTED]  
[REDACTED]

Buda, TX 78610  
07/02 FFL/SOT

Rick Vasquez Firearms LLC  
235 Deer Creek Road  
Winchester VA 22602

RECEIVED  
AUG 09 2017  
BY. FATO

EVAL.  
307-385

The Wolf Tactical AR1 trigger system is being submitted for evaluation as a trigger-finger reset device. This trigger system works by mechanically pushing the trigger rapidly forward, resetting the finger and trigger to the forward position. This allows the user to make a decision in which they leave rearward pressure off the trigger to stop the firing sequence, or re-engage rearward pressure on the trigger to continue the firing sequence. It is our opinion that this device submitted is only a trigger reset device, nevertheless it has been submitted for your classification.

Definitions: COLT COMPETITION SN: CCR 012176  
AR-15

A firearm: 18 U.S.C. § 921(a)(3), the Gun Control Act of 1968 (“GCA”) defines the term “firearm” to include “any weapon (including a starter gun) which will or is designed to or may be readily converted to expel a projectile by the action of an explosive, the frame or receiver of any such weapon...”

A machinegun: 26 U.S.C. § 5845(b), the National Firearms Act, Title II of the GCA (“NFA”), defines “machinegun” to include “any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. This term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.” (The mechanical function of the [REDACTED] AR1 trigger does not fall within the definition of “machinegun” under the NFA.)

ATF has previously interpreted the phrase “single function of the trigger” to mean a single movement of the trigger, whether that movement is the *pull* of the trigger or the *release* of the trigger. A trigger “functions” by causing the firing sequence to begin. This could be described as the release of a hammer or a striker.

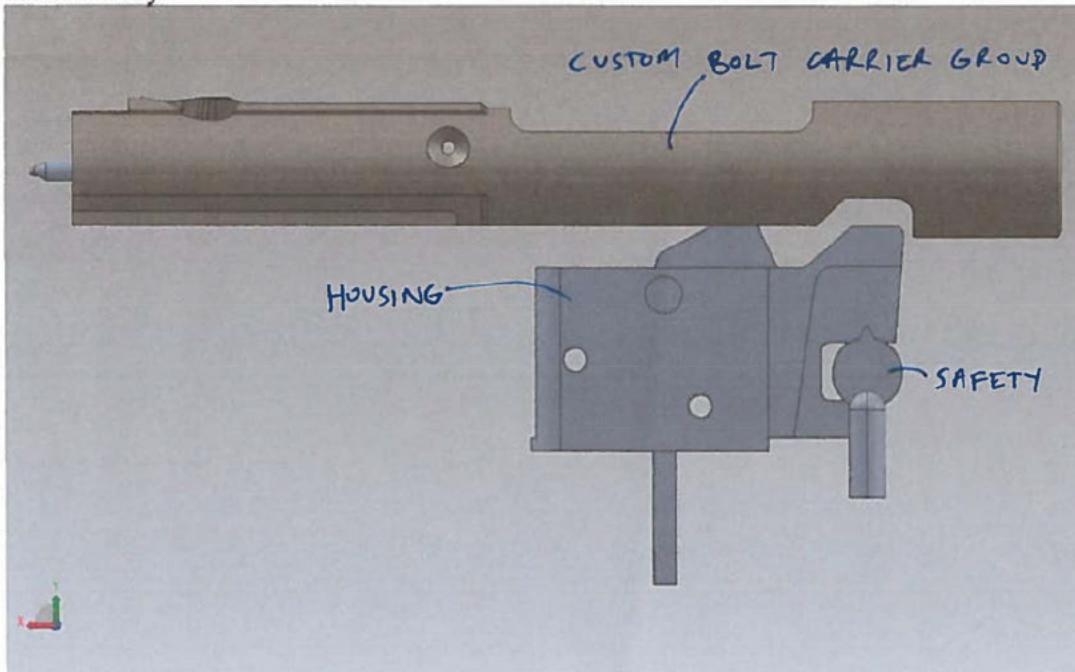
Consequently, if the firearm or device will allow more than one shot to fire when the trigger is pulled or when the trigger is released, then the firearm would have the capability to fire more than one shot by the single function of the trigger. This would make the firearm a machinegun as defined.

The [REDACTED] AR1 trigger is specifically designed to only fire a single round on each rearward movement of the trigger. All of the components of the [REDACTED] AR1 trigger are newly designed and include a bolt, housing, trigger, hammer, sear, springs and pins. These components interact in a manner which, upon pulling the trigger, the hammer is released from the sear firing a single round. In layman’s terms, following is the firing sequence:

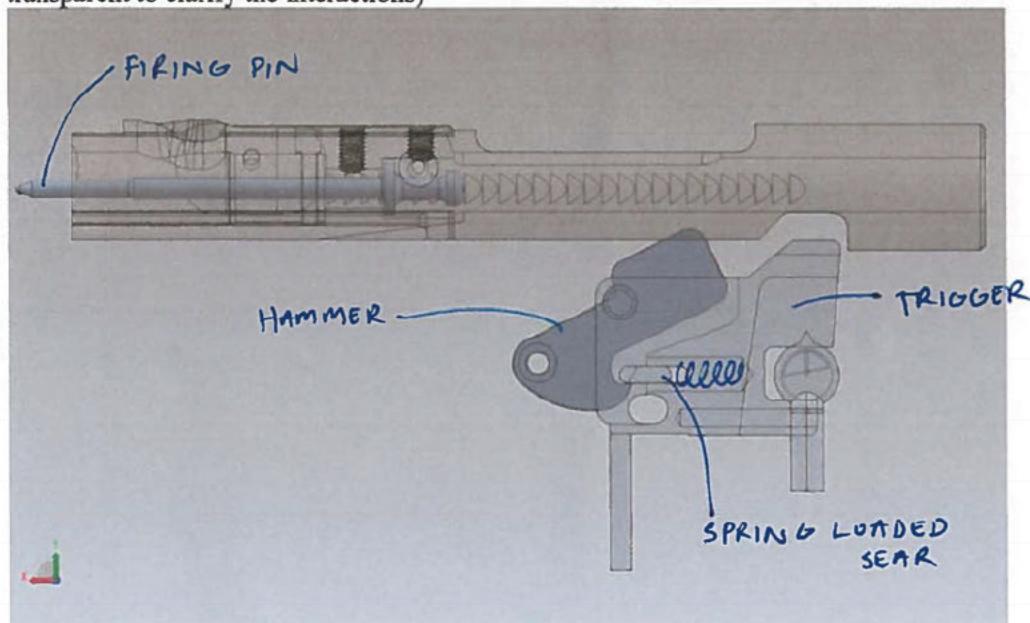
[REDACTED] AR1 Trigger:

2

We start with the trigger in the forward position and the hammer in the cocked position, with the bolt in battery



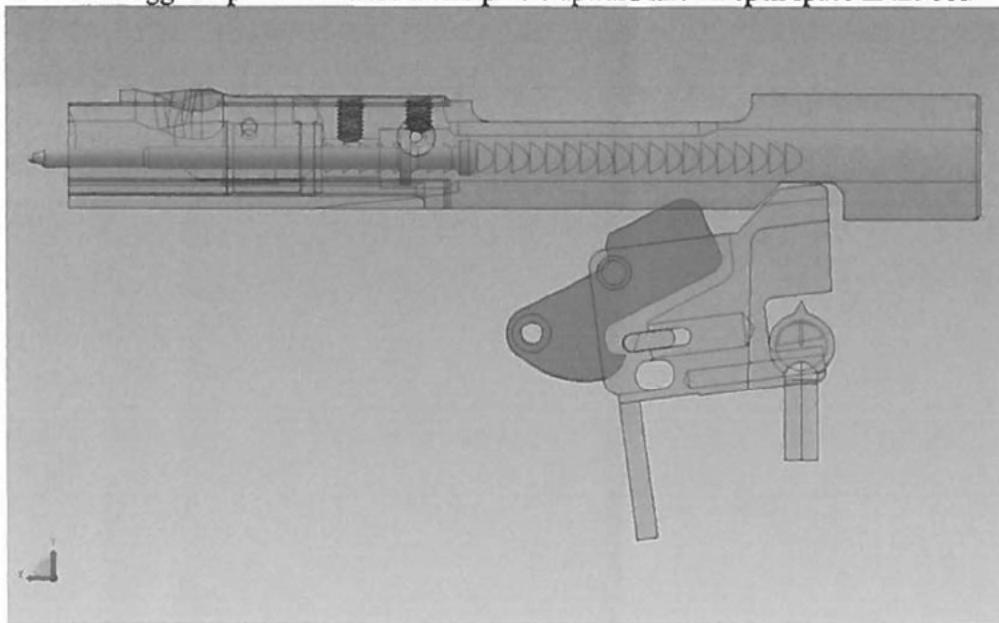
(In the rest of the images, not all parts are shown in all images and some are shown as transparent to clarify the interactions)



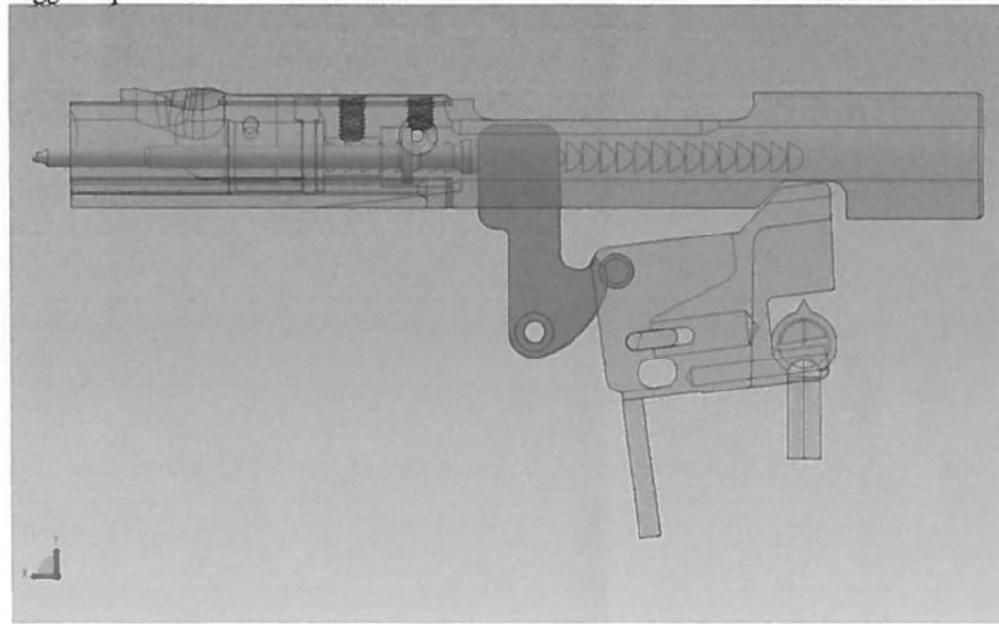
[REDACTED] AR1 Trigger:

3

When the trigger is pulled rearward it also pivots upward into an open space in the bolt



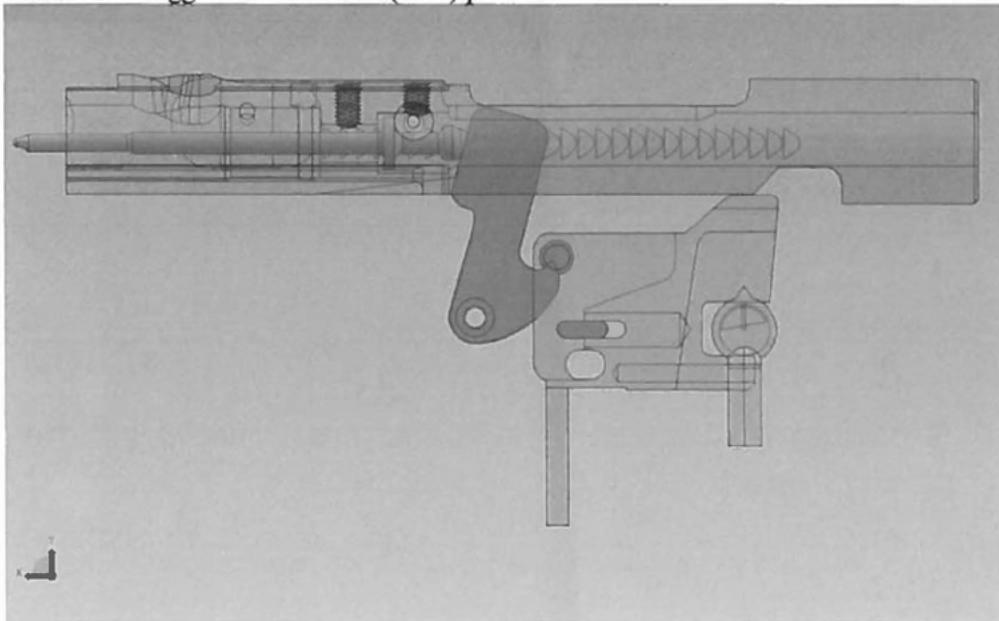
As the trigger pivots back and up into the open space in the bolt, the sliding sear surface in the trigger separates from the tail of the hammer and the hammer releases and fires a round



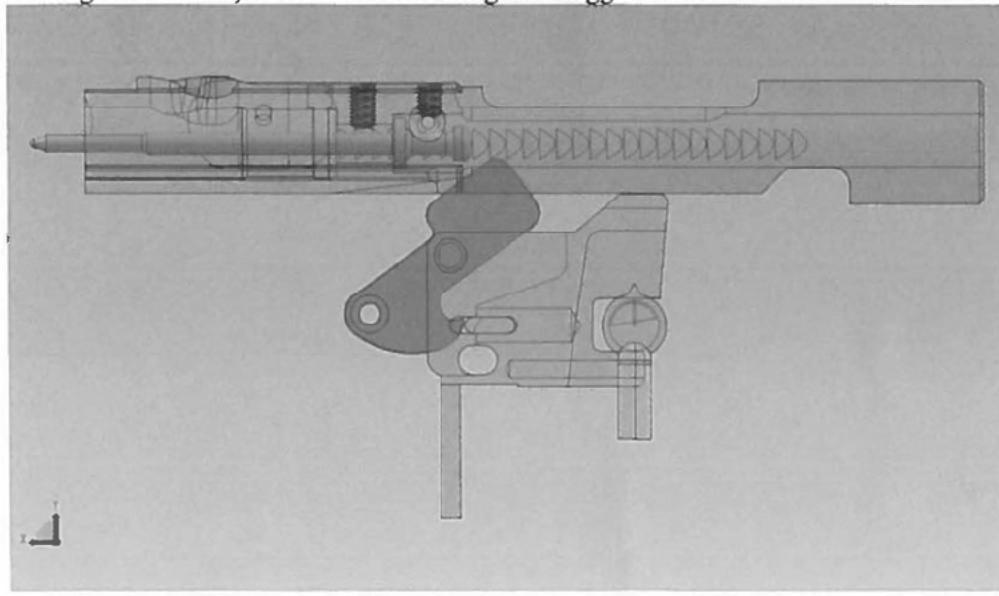
[REDACTED] AR1 Trigger:

4

The explosion of the bullet causes the bolt to move in a rearward direction. As the bolt moves rearward it contacts the top of the trigger and forces the top of the trigger down, pivoting the blade of the trigger to the forward (reset) position



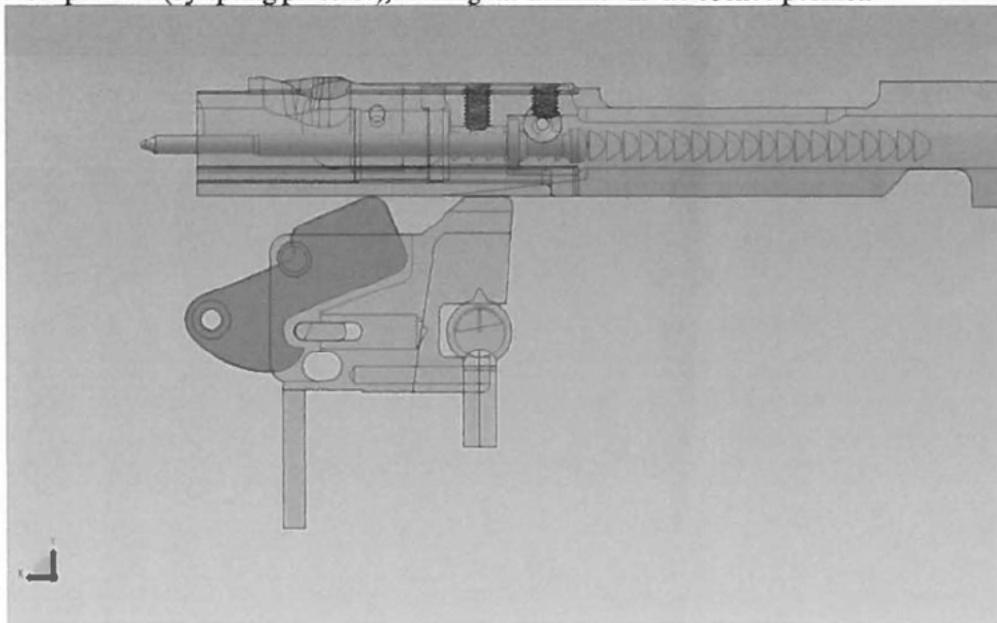
At this point the trigger is in the forward (unpulled) position. The bolt continues rearward cocking the hammer, which moves the integrated trigger sear rearward



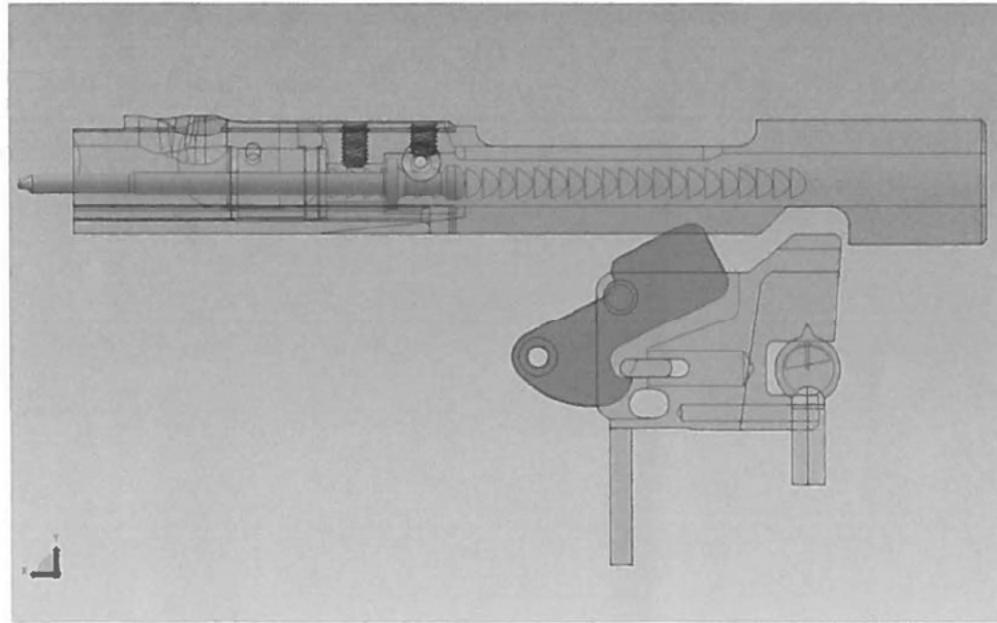
[REDACTED] AR1 Trigger:

5

At the rear of the bolt's stroke the hammer is cocked and the trigger sear is forced forward into a reset position (by spring pressure), locking the hammer in the cocked position



The bolt returns forward to battery and the hammer is now cocked against the trigger ready to fire the next round



[REDACTED] AR1 Trigger:

6

This is not an automatic sear, nor a conversion device. An automatic sear or a conversion device depends on a captured hammer that is tripped in some manner. This allows repetitive firing once the trigger is pulled rearward and the trigger remains in the pulled rearward position. The [REDACTED]

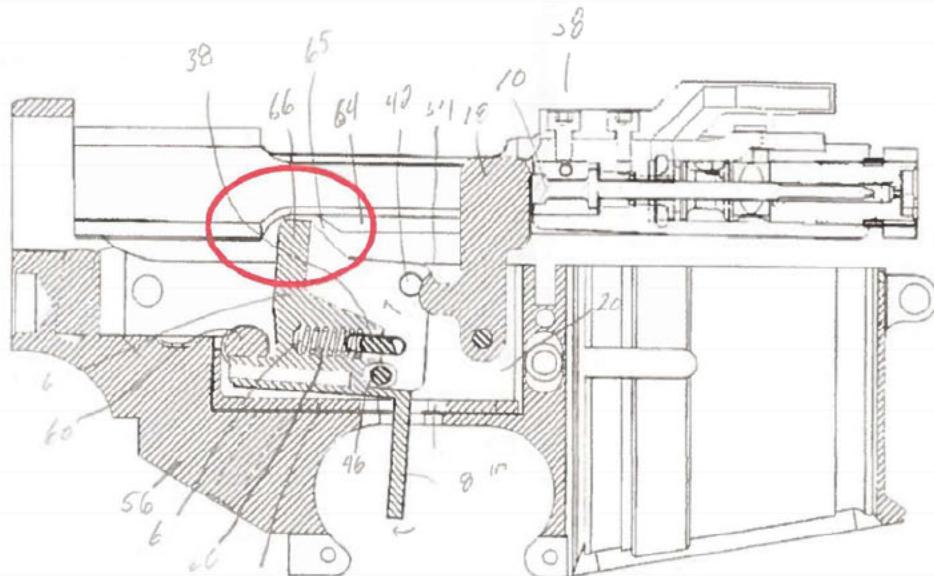
[REDACTED] AR1 trigger is a trigger finger reset device. The sequence of operation is designed so that when a shooter pulls the trigger and the weapon is fired, the trigger mechanically resets the user's trigger finger back to the original firing position. After the round has been fired, the trigger cannot be pulled during any part of the duration of the stroke of the bolt until the bolt has returned to battery. This ends the firing sequence or allows the user to mentally exert additional rearward pressure on the trigger to restart the firing sequence by pulling the trigger again. The design of the trigger mechanism is such that if the user maintains excessive rearward finger pressure on the trigger, the bolt's ability to return to battery will be impeded. The purpose and design of this device is to aid the user to fire a consecutive shot.

**Conclusion:**

It is our opinion that this is not a device designed or intended to create automatic fire. If you have any questions or need additional information I have authorized Rick Vasquez of Rick Vasquez Firearms LLC to act on my behalf. Rick Vasquez can be reached at (540) 535-6633. Thank you in advance for your efforts and we look forward to hearing your opinion.

[REDACTED] AR1 Trigger:

7



F

This illustration depicts how the parts interact.

No. 66 is the extension of the trigger that rests in the bolt cam.

No. 28 is the portion of the trigger that interacts with the user's finger.

No. 38 is the spring loaded sear.

No. 18 is the hammer.

**From:** Richard Vasquez  
**To:** [Fire Tech](#)  
**Subject:** Re: US Patent Information Evaluation 307385  
**Date:** Monday, November 27, 2017 3:52:40 PM

---

The patent for the general mechanism is:  
Flex-Fire technology  
US 9568264

This patent was published (approved) Feb 14, 2017.

Sincerely,

Richard Vasquez  
Rick Vasquez Firearms, LLC  
235 Deer Creek Road  
Winchester, VA  
Phone: [REDACTED]  
Email: [REDACTED]

On Mon, Nov 27, 2017 at 2:38 PM, <[REDACTED]> wrote:

Our office is currently reviewing a submission from Wolf Tactical LLC (AR1 trigger) which appears to include a patent drawing. Has a patent been applied for on this device and if so, what would be the Name and patent number?

Thank you, FTISSB

790894154587

R7NDelivered 307-385  
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Signed for by [REDACTED]

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ATF0168

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US

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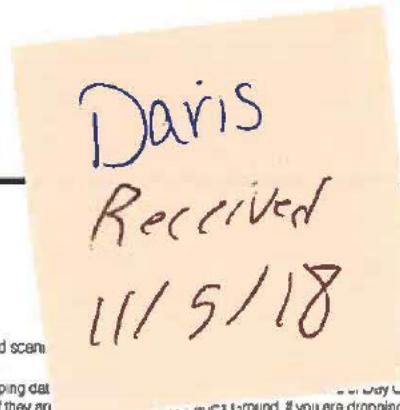
CAC: 113623214/NET4040



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From: [REDACTED]   
Subject: RE: Submission for testing and classification  
Date: September 17, 2018 at 7:40 AM  
To: [REDACTED]



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Sir,

**You can forward the shipping label or FedEx Billing number referencing work order #307385 and note that item should not be shipped until Oct3.**

Thankyou.

**From:** Fire Tech  
**Sent:** Monday, September 17, 2018 7:53 AM  
**To:**  
**Subject:** FW: Submission for testing and classification

See below.

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**From:** [REDACTED]  
**Sent:** Friday, September 14, 2018 3:57 PM  
**To:** Fire Tech [REDACTED]  
**Subject:** Re: Submission for testing and classification

I received a ruling on this submission. Attached is a photo of the letter I received in order to reference the ID #.

Per the last page of the letter, I would like to have the sample firearm and device returned as I have an 07/02 FFL/SOT. I accidentally failed to include a prepaid return shipping label with my submission but as I said, I would like it to be returned to me.

I will be away from my FFL shipping address until Tuesday, Oct 2nd. This would not matter except per the letter, I need to submit an ATF Form 2 by the close of the following business day that I receive the sample, and I will not be able to do that until Oct 3rd.

If this is not a problem I will send a prepaid common carrier shipping label or email a Fedex shipping account billing number.

Thank you kindly.

[REDACTED]

1



U.S. Department of Justice

Bureau of Alcohol, Tobacco,  
Firearms and Explosives

*Martinsburg, WV 25405*

[www.atf.gov](http://www.atf.gov)

AUG 28 2018

907010: RKD  
3311/307385

[REDACTED]  
Buda, Texas 78610

Dear Sir,

This is in reference to your submission and accompanying correspondence to, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Firearms Technology Industry Services Branch (FTISB), accompanied by an AR-15 type rifle equipped with what is described as the [REDACTED] AR1 trigger system (see enclosed photos). Specifically, you requested an examination and classification of this sample with regard to the amended Gun Control Act of 1968 (GCA) and the National Firearms Act (NFA).

As you know, the National Firearms Act (NFA), 26 U.S.C. § 5845(b), defines the term "machinegun" as—

*...any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.*

As specified in the GCA, 18 U.S.C. § 921(a)(23), the term "machinegun" has "the meaning given such term in section 5845(b) of the National Firearms Act (26 U.S.C. 5845(b)).

The submitted Wolf Tactical AR1, is described as a "trigger-finger reset device". You further describe the design and function of the device by explaining that this trigger system works by mechanically pushing the trigger rapidly forward, resetting the finger and trigger to the forward

On Aug 4, 2017, at 2:16 PM, [REDACTED] wrote:

Firearms and Ammunition Technology Division  
Attn: FTISB  
244 Needy Road Suite 1600  
Martinsburg, West Virginia 25405

-----Original Message-----

From: [REDACTED]  
Sent: Friday, August 4, 2017 1:26 PM  
To: Fire Tech [REDACTED]  
Subject: Submission for testing and classification

Hello,

I am submitting a complete rifle for testing and classification and I would like to confirm that the following is the correct address.

Firearms and Ammunition Technology Division  
244 Needy Road Suite 1600  
Martinsburg, West Virginia 25405

When sending a complete rifle to this location, is signature required necessary?

Thank you,

Jeffrey Rounds  
Wolf Tactical  
FFL/SOT 07/02